

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref No. 276

**SUPPLEMENTAL DECLARATION OF KATHRYN SCHULTEA IN SUPPORT OF
DEBTORS' MOTION FOR AN ORDER AUTHORIZING AND APPROVING
(I) THE RETENTION AND EMPLOYMENT OF RLKS EXECUTIVE SOLUTIONS LLC
AND (II) DESIGNATING THE CHIEF OFFICERS AS OFFICERS OF THE DEBTORS
NUNC PRO TUNC TO NOVEMBER 15, 2022**

I, Kathryn Schulte, hereby make this declaration (the "Declaration") under penalty of perjury pursuant to 28 U.S.C. § 1746 and state as follows:

1. I am the President and Chief Operating Officer of RLKS Executive Solutions LLC, a reorganization and consulting firm ("RLKS"). On December 21, 2022, I submitted a declaration (the "Original Declaration") in support of the *Debtors' Motion for an Order Authorizing and Approving (I) the Retention and Employment of RLKS Executive Solutions LLC and (II) Designating the Chief Officers as Officers of the Debtors Nunc Pro Tunc to November 15, 2022* [D. I. 276] (the "Motion").² I submit this supplemental declaration (this "Supplemental Declaration") in further support of the Motion. Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

2. RLKS does not have any affiliates.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion or the Original Declaration, as applicable.

3. Exhibit A attached hereto sets forth additional disclosures regarding connections between RLKS and its employees and the parties listed in Schedule 1 to the Original Declaration. In each case, these relationships are unrelated to the Debtors and these Chapter 11 Cases. The disclosures in the Original Declaration and this Supplemental Declaration set forth all connections between RLKS and its employees and the parties listed on Schedule 1 of the Original Declaration that RLKS is presently aware.

4. None of the Chief Officers, RLKS or its employees have any accounts with any of the Debtors.

5. Paragraph 19 of the Original Declaration is replaced with the following: Other than the appointment of the Chief Officers as of November 15, 2022, RLKS is a “disinterested person” as that term is defined in 11 U.S.C. § 101(14), in that RLKS (including its affiliates and employees):

- a. Is not a creditor (including by reason of unpaid fees and expenses for pre-petition services), equity security holder or insider of the Debtors;
- b. Is not and was not, within two (2) years before the date of the filing of the Chapter 11 Cases, a director, officer, or employee of the Debtors; and
- c. Does not have an interest materially adverse to the interest of the estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors or for any other reason.

6. On a going forward basis, RLKS will disclose any connections it or its employees have with any parties-in-interest that have not been previously disclosed, regardless of whether they rise to the level of representing an interest adverse to the Debtors, their creditors or other parties-in-interest.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 9, 2023
New York, New York

Respectfully submitted,

/s/ Kathryn Schulte

Kathryn Schulte
Chief Administrative Officer

EXHIBIT A

Party in Interest	Category	Relationship to RLKS
Sullivan & Cromwell LLP	Bankruptcy Professionals	Engaged in connection with the Ditech Cases, where I served as an officer; S&C partner James Bromley (through his former law firm) previously engaged on Nortel Cases, where I served as an officer, and OSG Cases, where I served as a consultant
Ernst & Young	Bankruptcy Professionals	Engaged as tax advisors on Enron, where I served as an officer, Nortel Cases and Ditech Cases
AlixPartners, LLP	Bankruptcy Professionals	Engaged on Ditech Cases
Quinn Emanuel Urquhart & Sullivan, LLP	Bankruptcy Professionals and Vendors	Engaged on Ditech Cases
Morris, Nichols, Arsht & Tunnell LLP	Ad Hoc Committee (Non US Customers of FTX.com)	Engaged as local counsel for Nortel Cases and OSG Cases
Jefferies	Bankruptcy Professionals	Engaged to provide exit financing for OSG Cases
Perella Weinberg Partners	Bankruptcy Professionals	PWP partner Bruce Mendelsohn (through his former banking firm) was engaged on the OSG Cases
Mary F. Walrath	Bankruptcy Judges	Assigned to the Nortel Cases
Pricewater House Coopers LLP	Vendors	Engaged as tax advisors on Ditech Cases
JPMorgan Chase Bank, N.A.	Banks/Lender/UCC Lien Parties/Administrative Agents	Ordinary course personal banking services
TriNet	Vendors	Engaged as a payroll provider on Ditech Cases
FTI Consulting, Inc.	Contract Counter-Parties	Engaged in various capacities on Enron and Nortel Cases; my temporary employer in connection with and limited to Enron wind down services in 2009
Nardello & Co, LLC	Contract Counter-Parties	Previously engaged on Ditech Cases
Perkins Coie LLP	Vendors	Engaged on Ditech Cases
Wells Fargo	Banks/Lender/UCC Lien Parties/Administrative Agents	Ordinary course personal banking services

Party in Interest	Category	Relationship to RLKS
John J. Ray	Director/Officer	Engaged in various other capacities on Enron, Abitibi Bowater, Nortel Cases, OSG Cases and Ditech Cases
Mary Cilia	Director/Officer	Engaged in various other capacities on Enron, Abitibi Bowater, Nortel Cases, OSG Cases and Ditech Cases
Raj Perubhatla	Director/Officer	Engaged in various other capacities on Enron, Abitibi Bowater, Nortel Cases, OSG Cases and Ditech Cases
Joseph J. Farnan	Director/Officer	Engaged as a mediator on Nortel Cases and Ditech Cases
Matt Rosenberg	Director/Officer	Engaged in various other capacities on Nortel Cases, OSG Cases and Ditech Cases
Rishi Jain	Director/Officer	Engaged as a director on Ditech Cases
HSBC Bank	Banks/Lender/UCC Lien Parties/Administrative Agents	Ordinary course personal accounts
Bank of America	Banks/Lender/UCC Lien Parties/Administrative Agents	Ordinary course personal accounts
AT&T	Utilities	Ordinary course personal accounts
The Hanover Insurance Group	Insurance	Ordinary course personal account
American Express	Vendors	Ordinary course personal accounts
Door Dash	Vendors	Ordinary course personal accounts
FEDEX	Vendors	Ordinary course RLKS business and personal accounts
Google	Vendors	Ordinary course personal accounts
Microsoft and Microsoft Online Inc	Vendors	Ordinary course personal and small business accounts
Pacer	Investments/Acquisitions	Ordinary course RLKS account
Comcast	Utilities	Ordinary course personal accounts
Facebook/Meta	Vendors	Ordinary course personal accounts
United Healthcare	Vendors	Ordinary course personal accounts
Verizon Wireless	Utilities	Ordinary course personal accounts
Amazon	Vendors	Ordinary course personal accounts
Twitter	Vendors	Ordinary course personal accounts
Apple Inc.	Vendors	Ordinary course personal accounts
Yahoo Inc.	Contract Counter-Parties	Ordinary course personal accounts

Party in Interest	Category	Relationship to RLKS
Adobe Systems Inc.	Vendors	Ordinary course RLKS business and personal accounts
Amazon Web Services (AWS)	Vendors	Ordinary course accounts; professional use by RLKS on Ditech Cases
GoDaddy	Vendors	Ordinary course RLKS business and other personal accounts
Insight Direct USA Inc	Vendors	User account for Ditech Cases
Roku	Vendors	Ordinary course personal product use
Gamestop	Vendors	Ordinary course personal accounts
MLB Advanced Media, L.P and The MLB Network, LLC and MLB Advanced Media	Contract Counter-Parties and Vendors	Ordinary course personal accounts
TikTok	Vendors	Ordinary course personal accounts
AIRBNB	Vendors	Ordinary course personal accounts
Crypto.com	Significant Competitors	Ordinary course personal accounts
Coinbase	Significant Competitors	Ordinary course personal account